1	Michael W. Melendez	
2	Nevada Bar No. 6741 Theresa Mae Rutledge	
3	Pro Hac Vice Application to be Filed COZEN O'CONNOR 101 Montgomery Street, Suite 1400	
4	101 Montgomery Street, Suite 1400 San Francisco, CA 94104 Tel: 415.644.0914	
5	Fax: 415.644.0978 Email: mmelendez@cozen.com	
6	trutledge@cozen.com	
7	Richard C. Mason Pro Hac Vice Application to be Filed	
8	COZEN O'CONNOR One Liberty Place	
9	1650 Market Street, Suite 2800 Philadelphia, PA 19103	
10	Tel: 215.665.2000 Fax: 215.665.2013	
11	Email: rmason@cozen.com	
12	Designation for Service Only: Delanoy, Schuetze, McGaha & Provost	
13	601 South Rancho Drive, Suite C-20 Las Vegas, NV 89106	
14	Attorneys for Defendant,	
15	ACE AMERICAN INSURANCE COMPANY	
16		
17	DISTRICT C	OF NEVADA
18	NEVADA TITLE COMPANY, a Nevada corporation,	Case No.: 2:18-cv-1823 GMN-VCF
19	Plaintiff,	STIUPLATION AND TO EXTEND TIME FOR ACE
20	v.	AMERICAN INSURANCE COMPANY TO RESPOND TO
21	ACE AMERICAN INSURANCE COMPANY, a	COMPLAINT (FIRST REQUEST)
22	Pennsylvania corporation,	U.S. DIST. NV. L.R. IA 6-1
23	Defendant.	
24 25	WHEREAS this is the first request for a	n extension of the deadline for Defendant ACE
26	WHEREAS, this is the first request for an extension of the deadline for Defendant ACE American Insurance Company ("ACE") to answer the Complaint by Plaintiff Nevada Title	
27	Company ("NTC");	
28	WHEREAS, filed NTC filed its Complaint against ACE on September 12, 2018;	
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1	WHEREAS, ACE removed the action to this Court on September 20, 2018;
2	WHEREAS, ACE's Answer to the Complaint is due on October 11, 2018 (see ECF No. 6);
3	WHEREAS, counsel for NTC and ACE have met and conferred regarding ACE's response
4	deadline, and ACE has requested further time to answer the Complaint, which includes specific
5	allegations concerning several underlying actions;
6	WHEREFORE, NTC and ACE hereby stipulate that: ACE shall have up to and until
7	November 13, 2018 to answer NTC's Complaint.
8	Dated: October 4, 2018 By: /s/ Michael W. Melendez
9	MICHAEL W. MELENDEZ Nevada Bar No. 6741
10	THERESA MAE RUTLEDGE Pro Hac Vice Application to be Filed
11	COZEN O'CONNOR 101 Montgomery Street, Suite 1400
12	San Francisco, ČA 94104 Tel: 415.644.0914
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15	RICHARD C. MASON
16	Pro Hac Vice Application to be Filed COZEN O'CONNOR
	One Liberty Place 1650 Market Street, Suite 2800
17	Philadelphia, PA 19103
18	Tel: 215.665.2000 Fax: 215.665.2013
19	Email: rmason@cozen.com
20	Attorneys for Defendant ACE AMERICAN INSURANCE COMPANY
21	ACE AMERICAN INSURANCE COMI ANT
22	Dated: October 4, 2018 By: /s/ Steven J. Parsons STEVEN J. PARSONS
	Nevada Bar No. 363
23	LAW OFFICES OF STEVEN J. PARSONS 10091 Park Run Drive, Suite 200
24	Las Vegas NV 89145-8868 Tel: 702.384.9900
25	Fax: 702.384.5900
26	Email:Steve@SJPlawyer.com
27	Attorneys for Plaintiff NEVADA TITLE COMPANY
28	///
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1	<u>ORDER</u>	
2	Based on the stipulation by parties, it is ordered that ACE American Insurance Company	
3	shall have up to and until November 13, 2018 to answer Nevada Title Company's Complaint.	
4	IT IS SO ORDERED.	
5	IT IS SO ORDERED. Dated: October 4, 2018	
6	U.S. Magistrate Judge	
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